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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

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2012 NOV 19 P 4:48

ARIZONA CORPORATION COMMISSION
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Arizona Corporation Commission

DOCKET

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IN THE MATTER OF MOHAVE ELECTRIC
COOPERATIVE, INCORPORATED
REQUEST FOR APPROVAL OF 2012 – 2013
DEMAND SIDE MANAGEMENT PLANS
AND ENERGY EFFICIENCY
IMPLEMENTATION PLAN, INCLUDING
DSM ADJUSTMENT TARIFF; REQUEST
FOR PARTIAL WAIVER PURSUANT TO
THE ENERGY EFFICIENCY STANDARD
RULES

DOCKET NO. E-01750A-11-0228

AMENDMENT TO EXTEND
PLAN PERIOD AND SCOPE
OF REQUESTED WAIVER

Mohave Electric Cooperative, Incorporated (“Mohave” or the “Cooperative”), by and through its undersigned attorneys, hereby amends the above-captioned application, to request that its proposed Energy Efficiency Implementation Plan be extended through calendar year 2014 and that the cumulative energy efficiency requirements of 16.5% established by A.A.C. R14-2-2418(C) and R14-2-2404 be waived.

MEC fully supports reducing energy consumption through energy efficiency, load management and demand response programs where program benefits appropriately offset program costs. As reflected by MEC’s Application, MEC has pursued a number of these programs for many years. Its proposed EE plan proposes \$540,000 in annual funding for the various energy efficiency and demand side management programs set forth in its proposed two-year EE plan. MEC’s consultant estimates that it would be necessary to substantially increase funding of these programs to \$2.3 million annually to achieve the energy efficiency requirements set forth in A.A.C. R14-2-2418(C) and R14-2-2404 for 2012 and 2013.

MEC serves approximately 32,500 members located in portions of Mohave, Coconino and Yavapai Counties. MEC's customers historically have had annual incomes below the statewide norms and the area is experiencing unemployment at higher rates than statewide averages. A significant portion of MEC's customer base is seasonal or move frequently, either within or among service areas, resulting in an extremely transient customer base. The number of days exceeding 110 degrees throughout MEC's service area is significant. As a distribution cooperative, MEC owns no generation. Therefore, it is difficult, if not impossible, to accurately quantify benefits to MEC member-customers from reducing future generation.

MEC believes the foregoing factors result in power use being driven largely by weather and that a low percentage of its customers are willing or able to invest their own limited dollars in energy efficiency improvements. MEC believes it is unreasonable for MEC to propose, or for the Commission to approve, EE funding at levels necessary to provide MEC a reasonable opportunity to achieve the Commission's energy efficiency requirements.

It is now November 2012. Therefore, it is obvious that MEC will not be able to implement its first EE Plan until at least January 2013 yet the Commission's cumulative energy efficiency requirements are based upon plans being in place commencing with 2011.

Based upon the foregoing, MEC respectfully requests that its proposed EE plan, which is designed as a two year plan, be approved for calendar years 2013 and 2014 in satisfaction of the energy efficiency requirements for 2011, 2012, 2013 and 2014 and that the cumulative energy efficiency requirement for those years, as well as the final 16.5% requirement as set forth in A.A.C. R14-2-2418(C) and R14-2-2404 be waived. Such waiver is consistent with Commission Decision No. 73257, dated July 30, 2012, where the requirements for Graham County Electric Cooperative, Inc. were waived. MEC would next file an EE plan no later than June 1, 2014.

1 WHEREFORE, Mohave Electric Cooperative, Incorporated respectfully
2 requests the Arizona Corporation Commission:

- 3 1. Approve MEC's amended EE plan for calendar years 2013 - 2014;
4 2. Authorize the implementation of the proposed DSM Adjustor of
5 \$0.000799 per kWh to be applied to all of the Cooperative's Standard
6 Offer Tariffs;
7 3. Waive the provisions of the Energy Efficiency Standards and, in
8 particular, the energy savings requirements of A.A.C. R14-2-2418(C)
9 and R14-2-2404 to:
10 a. Recognize implementation of the approved EE Plan satisfies
11 the Commission's energy efficiency requirements for 2011,
12 2012, 2013 and 2014; and
13 b. Waive the cumulative energy efficiency requirement of
14 16.5%;
15 4. Order MEC to file its next EE Plan not later than June 1, 2014; and
16 5. Grant such other relief as the Commission deems just and
17 appropriate.

18 DATED this 19th day of November, 2012.

19 CURTIS, GOODWIN, SULLIVAN,
20 UDALL & SCHWAB, P.L.C.

21
22 By: 

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 Attorneys for Mohave Electric Cooperative,
 Incorporated

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PROOF OF AND CERTIFICATE OF MAILING

I hereby certify that on this 19th day of November, 2012, I caused the foregoing document to be served on the Arizona Corporation Commission by delivering the original and thirteen (13) copies of the above to:

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

